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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

LEPRINO FOODS COMPANY;
LEPRINO FOODS HEALTH &
WELFARE PLAN,

Plaintiffs,

v.

AVANI OUTPATIENT SURGICAL
CENTER, INC., a California
Corporation; MOUNTAIN VIEW
SURGICAL CENTER, INC., a
California Corporation; THE
CENTER FOR SURGERY AT
BEDFORD, LLC, a California limited
liability company; AMY ZARAGOZA,
an individual; BABAK
MOEINOLMOLKI, an individual;
BEHNAM KASHANCHI, an
individual; SAMUEL KASHANI, an
individual; SHERVIN AMINPOUR,
an individual; RALPH MAYER, an
individual; MICHAEL YADEGARI, an
individual; KARAPET
DERMENDJIAN, an individual;
SEPEHR LALEZARI, an individual;
MARIO ROSENBERG, an individual;
PEYMAN SOLIEMANZADEH, an
individual; and DOES 1-30,

Defendants.

Case No. 2:22-cv-07434 DSF (JC)

**PLAINTIFFS LEPRINO FOODS
COMPANY AND LEPRINO FOODS
HEALTH & WELFARE PLAN'S
NOTICE OF APPLICATION FOR
DEFAULT JUDGMENT
PURSUANT TO FED. R. CIV. P.
55(b)**

Judge: Hon. Dale S. Fischer
Date: March 25, 2024
Time: 1:30 PM
Crtrm.: 7D

AND RELATED COUNTERCLAIMS.

20486273.1

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on March 25, 2024 at 1:30 PM, or as soon thereafter as may be heard, before the Honorable Dale S. Fischer, in Courtroom 7D of the United States District Court for the Central District of California, located at 350 W. First Street, Los Angeles, CA 90012, Plaintiffs Leprino Foods Company and Leprino Foods Health & Welfare Plan (collectively, "Leprino") apply for entry of default judgment against Defendant Christina "Luz" Perryman ("Ms. Perryman") for failure to plead or otherwise defend against this action in a timely manner (the "Application"). The Application is made pursuant to Rule 55(b) of the Federal Rules of Civil Procedure.

The Application is based upon this Notice and the concurrently filed Memorandum of Points and Authorities, Declaration of Katherine A. Bowles, the pleadings, and such other matters on file with the Court, including those specifically referenced by Leprino.

DATED: February 22, 2024

HANSON BRIDGETT LLP

By: /s/ Katherine A. Bowles
KATHERINE A. BOWLES
Attorneys for Leprino Foods Company,
Leprino Foods Health & Welfare Plan

PROOF OF SERVICE

Leprino Foods Company, et al., v. Avani Outpatient Surgical Center, et al.

U.S.D.C. Central District of CA, Case No. 2:22-cv-07434 DSF (JC)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of . My business address is 777 S. Figueroa Street, Suite 4200, Los Angeles, CA 90017.

On February 22, 2024, I served true copies of the following document(s) described as **PLAINTIFFS LEPRINO FOODS COMPANY AND LEPRINO FOODS HEALTH & WELFARE PLAN'S NOTICE OF APPLICATION FOR DEFAULT JUDGMENT PURSUANT TO FED. R. CIV. P. 55(B)** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address sabrignani@hansonbridgett.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on February 22, 2024, at Los Angeles, California.

/S/ Silvia Abrignani
Silvia Abrignani

SERVICE LIST

Leprino Foods Company, et al., v. Avani Outpatient Surgical Center, et al.

U.S.D.C. Central District of CA, Case No. 2:22-cv-07434 DSF (JC)

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[Note: Updated April 2023]

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Kashanchi's Estate, Trustee of The
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and Trustee of the Kashanchi B & M
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